

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Federal-State Joint Board on Universal Service) CC Docket No. 96-45
)
Petition of AT&T Wireless Services, Inc. for)
Designation as an Eligible)
Telecommunications Carrier in the State of)
Florida Pursuant to Section 214(e)(6) of the)
Communications Act)

To: Chief, Wireline Competition Bureau

**AMENDMENT TO THE PETITION OF AT&T WIRELESS SERVICES, INC. FOR
DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER
IN THE STATE OF FLORIDA**

Cingular Wireless LLC (“Cingular”), on behalf of itself and its affiliated licensee entities in Florida, respectfully submits an amendment to the petition of AT&T Wireless Services, Inc. (“AWS”) for Designation as Eligible Telecommunications Carrier in the State of Florida, filed April 30, 2004 (“AWS Petition”).¹ Since the filing of the AWS Petition, AWS was merged into a subsidiary of Cingular’s parent and manager, Cingular Wireless Corporation (“CWC”). As part of the merger, the Commission approved a transfer of control of licenses held by AWS and its subsidiaries to CWC and its subsidiaries.² As such, the licenses at issue in this ETC petition

¹ AWS’ petition was put on Public Notice in May 2004. *Parties Are Invited to Comment on Petitions for Eligible Telecommunications Carrier Designations*, CC Docket No. 96-45, Public Notice, DA 04-1445 (rel. May, 21, 2004).

² *Application of AT&T Wireless Services, Inc. and Cingular Wireless Corp. For Consent to Transfer Control of Licenses and Authorizations*, WT Docket No. 04-70, *Memorandum Opinion and Order*, 19 FCC Rcd 21522 (2004) (“*Cingular Merger Order*”). Immediately thereafter, the parties consummated the merger. CWC and AWS also entered into a consent decree on October 25, 2004 with the Antitrust Division of the U.S. Department of Justice (continued on next page)

are now either wholly owned or controlled by Cingular. Cingular files this amendment to update the legal names of the applicant entities in the AWS Petition and to amend the petition to include all non-rural wire centers in Florida served by the merged entity. This Amendment also withdraws all rural telephone company study areas in which designation was requested in the AWS Petition. The revised list of wire centers in which designation is requested is set forth in Exhibit B attached hereto.

AWS requested ETC designation on behalf of itself and the following subsidiary licensees: AT&T Wireless Services of Florida, Inc.; Melbourne Cellular Telephone Company; Sarasota Cellular Telephone Company; AT&T Wireless PCS, LLC; and Bradenton Cellular Partnership.

The licenses held by these subsidiaries have been transferred variously to the following Cingular entities: New Cingular Wireless PCS, LLC; Blue Licenses Holding, LLC; Orange Licenses Holding, LLC; Melbourne Cellular Telephone Company; and Sarasota Cellular Telephone Company.

In this amendment, Cingular provides certification that it, like its predecessor in interest AWS, meets the statutory and regulatory prerequisites for designation as a federal ETC. This amendment also provides certain additional minor updates to the information in the AWS Petition. For the Bureau's convenience, the format of this amendment generally tracks the format used in the AWS Petition.

("DOJ") approving the merger. *United States v. Cingular Wireless Corp., SBC Communications Inc., BellSouth Corp., and AT&T Wireless Services, Inc.*, 69 Fed. Reg. 65633 (rel. Nov. 15, 2004). *See also* AWS Petition at 3 n.3 (noting the pendency of the merger application).

I. BACKGROUND

Cingular is a Delaware limited liability company whose principal place of business is located in Atlanta, Georgia. All correspondence regarding this proceeding should be directed to the undersigned counsel for Cingular:

David G. Richards
CINGULAR WIRELESS LLC
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Cingular is authorized by the Commission to provide commercial mobile radio services (“CMRS”) throughout the licensed service areas within the state of Florida noted in Attachment D.

As did AWS, Cingular provides all of the services and functionalities supported by the federal universal service programs enumerated in 47 C.F.R. § 54.101(a)(1)-(9) throughout its licensed service areas in Florida. Cingular also certifies that it will offer a variety of high-quality universal service offerings in its designated areas utilizing its wireless network infrastructure. Cingular will offer service to any requesting customers within its designated service area upon reasonable request.

Cingular will use high-cost support for the provision, maintenance, and upgrading of the facilities and the services for which universal service is intended. Cingular will use low-income universal service support for the provision of Lifeline and Link-Up discounted services to qualifying, low-income consumers.

II. CINGULAR SATISFIES THE STATUTORY AND REGULATORY PREREQUISITES FOR DESIGNATION AS A FEDERAL ETC

As AWS demonstrated in filing the Petition, Cingular also satisfies each of the statutory and regulatory prerequisites set forth in the Act, the Commission's Rules and orders,³ and the *Public Notice*⁴ to be designated a federal ETC in the state of Florida.

A. Cingular is a Common Carrier

Cingular certifies that it is a "common carrier" under 47 U.S.C. § 214(e)(1) and 214(e)(6) for purposes of ETC designation.

B. Cingular Offers the Services and Functionalities Supported by the Federal High-Cost and Low-Income Universal Service Program

AWS listed in its Petition the services and functionalities that the Commission considers to be the core services to be offered by an ETC and supported by the federal universal service support mechanism, including: (1) voice-grade access to the public switched telephone network; (2) local usage; (3) dual-tone multi-frequency signaling or its functional equivalent; (4) single-party service or its functional equivalent; (5) access to emergency services; (6) access to operator services; (7) access to interexchange service; (8) access to directory assistance; and (9) toll limitation for qualifying low-income consumers.⁵ A certification is required that the carrier provides the supported services. Cingular confirms in the attached Declaration of Cingular

³ *Federal-State Joint Board on Universal Service; Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 19 FCC Rcd 1563 (2004) ("Virginia Cellular"); *Federal-State Joint Board on Universal Service; Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, *Memorandum Opinion and Order*, 19 FCC Rcd 6422 (2004) ("Highland Cellular").

⁴ *Procedures for FCC Designation of Eligible Telecommunications Carriers Pursuant to Section 214(e)(6) of the Communications Act*, CC Docket No. 96-45, *Public Notice*, 12 FCC Rcd 22947 (1997).

⁵ 47 C.F.R. § 54.101(a)(1)-(9).

Wireless LLC (attached as Exhibit A) that it currently provides all of the supported services specified in 47 C.F.R. § 54.101(a)(1)-(9) throughout its requested service areas as follows.

C. Cingular Will Provide the Supported Services Using its Own Facilities or a Combination of Its Own Facilities and Resale of Another Carrier's Services

Cingular certifies that it will provide the supported services using its own facilities or a combination of its own facilities and the resale of another carrier's service. Cingular primarily will use its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching and interconnection facilities used to serve its existing customers.

D. Cingular Will Advertise the Availability of and Charges for its Universal Service Qualifying Offerings

As AWS noted in its Petition, Cingular certifies that it will advertise the availability of the supported services and the corresponding rates and charges in a manner designed to inform the general public within its designated ETC service areas. This advertising will occur through some combination of media channels, such as television and radio, newspaper, magazine and other print advertisements, outdoor advertising, direct marketing and the Internet.

III. CINGULAR REQUESTED ETC SERVICE AREA

In light of the merger, Cingular hereby amends the AWS Petition to include additional non-rural wire centers that are served by the merged entity. Specifically, Cingular requests designation in the following additional non-rural BellSouth wire centers in Florida: Lynnhaven; Panama City Beach; Panama City Main; Youngstown-Fountain; and Panama City Callaway. These wire centers are identified specifically in Exhibit B. This amendment also withdraws all rural telephone company study areas in which designation was requested in the AWS Petition.

IV. DESIGNATING CINGULAR AS A COMPETITIVE ETC WILL SERVE THE PUBLIC INTEREST

A. Non-Rural Telephone Company Service Areas

As noted above, the Amendment withdraws all rural telephone company study areas from the request for ETC designation in Florida. Although the Commission has described the public interest standard to be applied in rural areas, the Commission has not articulated a distinct public interest standard for non-rural territory. The AWS Petition demonstrated why the requested ETC designation would meet the public interest standard applicable in rural areas, which is higher than the public interest standard for non-rural areas. In light of that showing, as well as the information provided below, designation of Cingular in the non-rural areas requested clearly would serve the public interest.

An additional unique advantage of the merged entity's network is its impending ability to provide a nationwide GSM network. GSM has the benefit of being the global standard for interconnected mobile voice services and offers a simple migration path for meeting the demand for new services during the conversion to a true 3G network. Additionally, Cingular is currently in the process of transitioning its EDGE data network to the Universal Mobile Telecommunications System ("UMTS").⁶ Although data is not a supported service, and Cingular will not use universal service funds for data deployment, the availability of mobile data services on Cingular's network is a public interest benefit to subscribers of Cingular's universal service offering.

⁶ UMTS will initially permit data transmission at speeds of up to about 2 Mbps and eventually, when upgraded with High Speed Downlink Packet Access ("HSDPA"), at speeds of up to 10 Mbps. See UMTS World, WCDMA(UMTS), at <http://www.umts-world.com/technology/wcdma.htm> (visited June 23, 2005); UMTS World, HSPDA in W-CDMA, at <http://www.umtsworld.com/technology/hsdpa.htm> (visited June 23, 2005).

Another important benefit to deployment of Cingular's network outside of urban areas is the advantage it can bring to other small wireless carriers in Florida. Small or regional carriers that also deploy GSM will benefit greatly by partnering with a nationwide GSM carrier having an expanded non-urban reach. Cingular's willingness to enter into automatic roaming agreements with rural carriers has been widely documented in the Cingular/AWS merger docket.⁷

For the foregoing reasons and the reasons articulated in the AWS Petition, the Commission should find that it is in the public interest to designate Cingular as an ETC in the non-rural wire centers listed in Exhibit B.

B. Use of Support for the Preservation and Advancement of Universal Service

Once designated, Cingular commits to use the support it receives for network expenditures for the provision, maintenance, and upgrading of its facilities and services within the designated area.⁸ While Cingular already provides excellent service in Florida, nevertheless, it intends to use the bulk of the support to continue to improve service coverage and service quality.⁹ Specifically, Cingular would use the support to build a number of new cell sites and other infrastructure that would not be built but for receipt of universal service funding. The areas covered by these new cell sites have a substantially lower population density than the areas already covered, such that the economics ordinarily would not support the required expenditures.

⁷ Cingular Wireless Corporation, Written *Ex Parte* Presentation, WT Docket No. 04-70 (filed Sept. 15, 2004) (noting Dobson's statement that it has multi-year roaming agreements with Cingular and stating that "[v]irtually every rural carrier and wireless company that has participated in the docket has supported the merger").

⁸ See 47 U.S.C. § 254(e).

Cingular would also use support for other projects to improve the reliability and capacity of wireless service in the supported areas. For example, consistent with measures Cingular employs in furtherance of emergency preparedness and homeland security, the support also will fund facilities improvements to help assure continuity of service within the designated area, such as installation of additional back-up generators at mobile switching facilities and cell towers. Likewise, Cingular intends to purchase additional cell sites on wheels (“COWs”) and cell sites on light trucks (“COLTs”) to add to its existing fleet of these vehicles that can be deployed in the event of problem with an existing cell site or an emergency situation creating an urgent need for additional capacity. The funds also will be used to improve physical structures at cell sites to improve reliability in inclement weather conditions. Cingular takes seriously the service responsibility that comes with ETC designation and will use the support it receives to help fulfill this responsibility.

C. Cingular’s Commitment to Service Quality

Cingular affirms the service quality commitments in the AWS Petition. Specifically, Cingular is a signatory to the CTIA Code of Conduct for Wireless Service. Additionally, Cingular will provide the Commission with aggregated FCC complaint data on a company-wide basis per 1000 handsets and any Florida-specific information to the extent it is available.

D. Cingular’s Commitment to Quality Emergency Services

Cingular’s commitment to emergency service is consistent with AWS’ representations in its Petition. Cingular has the same contingency plan as expressed by AWS and will be able to provide and maintain essential telecommunications services in times of emergency.

⁹ As the Commission acknowledged in the *Virginia Cellular Order*, the Commission’s Rules permit a finding of full coverage despite the existence of dead spots. *Virginia Cellular Order* at ¶ 23 (citing 47 C.F.R. § 22.99).

E. Cingular's Commitment to Provide Service Upon Reasonable Request

Consistent with AWS' representations, Cingular will take the same actions to act upon a reasonable request for service.

V. HIGH-COST CERTIFICATON

As AWS noted, Cingular must submit its high-cost certification to the FCC since the Florida Public Service Commission does not regulate wireless carriers. As such, a copy of Cingular's High-Cost Certification is attached as Exhibit C.

VI. ANTI-DRUG ABUSE CERTIFICATION

Cingular's anti-drug abuse certification is attached as Exhibit A.

VII. CONCLUSION

Cingular respectfully requests that the Commission amend the names of the legal entities for which designation is sought and allow for designation in the new wire centers served by Cingular, and the withdrawal of the rural study areas included in the AWS Petition. For the reasons noted above and in AWS' Petition, the Commission should designate Cingular as a federal ETC in each of the wire centers set forth in Exhibit B attached hereto.

Respectfully submitted,

CINGULAR WIRELESS LLC

By: /s/
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(404) 236-5543

Its Attorneys

June 23, 2005

EXHIBIT A

DECLARATION OF CINGULAR WIRELESS LLC

I, Paul Roth, after first being sworn on oath, and pursuant to 47 C.F.R. § 1.1 states as follows:

1. That I am the Executive Vice President – External Affairs & Public Relations of Cingular Wireless LLC. My business address is 5565 Glenridge Connector, Suite 2022, Atlanta, GA, 30342.

2. In my capacity as Executive Vice President – External Affairs & Public Relations of Cingular Wireless LLC, I am an authorized representative of the Company and its subsidiary licensees, New Cingular Wireless PCS LLC, Blue Licenses Holding, LLC, Orange Licenses Holding, LLC, Melbourne Cellular Telephone Company and Sarasota Cellular Telephone Company (collectively, Cingular) with regard to Cingular's Amended Petition for Designation as an Eligible Telecommunications Carrier in the State of Florida (Amended Petition). I have read Cingular's Amended Petition and believe the information therein to be true and correct to the best of my present knowledge.

3. Cingular is a commercial mobile radio services (CMRS) licensee authorized by the Federal Communications Commission (Commission) throughout the following licensed service areas wholly or partially within the State of Florida: Florida 2 - Gaines, CMA 361; Jacksonville, FL, CMA 051; Florida 5 - Putnam, CMA 364; Fort Myers, FL, BTA 151; Fort Pierce-Vero Beach-Stuart, FL, BTA 152; Fort Walton Beach, FL, BTA 154; Gainesville, FL, BTA 159; Lakeland-Winter Haven, FL, BTA 239; Naples, FL, BTA 313; Ocala, FL, BTA 326; Panama City, FL, BTA 340; Pensacola, FL, BTA 343; Sarasota-Bradenton, FL, BTA 408; Tallahassee, FL, BTA 439; Tampa-St. Petersburg-Clearwater, FL, BTA 440; Miami-Fort Lauderdale-Hollywood, FL, CMA 012; West Palm Beach-Boca Raton, FL, CMA 072; Florida 1 - Collier, CMA 360; Florida 11 - Monroe, CMA 370; Orlando, FL, CMA 060; Melbourne-Titusville-Palm Bay, FL, CMA 137; Daytona Beach, FL, CMA 146; Florida 4 - Citrus, CMA 363; Tampa-St. Petersburg, FL, CMA 022; Lakeland-Winter Haven, FL, CMA 114; Pensacola, FL, CMA 127; Fort Myers, FL Counties - Lee, CMA 164; Fort Pierce, FL, CMA 208; Fort Walton Beach, FL, CMA 265; Florida 3 - Hardee, CMA 362; Bradenton, FL, CMA 211; Daytona Beach, FL, BTA 107; Melbourne-Titusville, FL, BTA 289; Miami-Fort Lauderdale, FL, BTA 293; Orlando, FL, BTA 336; West Palm Beach-Boca Raton, FL, BTA 469; Tallahassee, FL, CMA 168; Gainesville, FL, CMA 192; Florida 6 - Dixie, CMA 365; Florida 7 - Hamilton, CMA 366; Florida 8 - Jefferson, CMA 367; Florida 9 - Calhoun, CMA 368; Florida 10 - Walton, CMA 369; Tampa-St. Petersburg-Orlando, FL, MTA 013; Miami-Fort Lauderdale, FL MTA 015; Ocala, FL, CMA 245; Sarasota, FL, CMA 167 (collectively, Cingular Licensed Service Areas).

4. As a CMRS provider, Cingular is not subject to state commission jurisdiction in the State of Florida and, therefore, is seeking designation as an ETC pursuant to the Commission's jurisdiction under 47 U.S.C. § 214(e)(6). The Florida Public Service Commission has affirmatively stated that it will not exercise jurisdiction over CMRS providers for purposes of

ETC designation.

5. As set forth below, Cingular meets all of the prerequisites to be designated as a federal ETC throughout its requested ETC service areas in the State of Florida.

6. First, Cingular is a "common carrier" as set forth in the Amended Petition.

7. Second, Cingular currently provides CMRS in the State of Florida and will provide all of the supported services specified in 47 C.F.R. § 54.101(a)(1)-(9) in its requested ETC service areas. Cingular currently provides the nine supported services in its Licensed Service Areas, as follows:

- (a) Voice Grade Access.
- (b) Local Usage.
- (c) Dual Tone Multi-Frequency Signaling or Its Functional Equivalent.
- (d) Single-Party Service or its Functional Equivalent.
- (e) Access to Emergency Service.
- (f) Access to Operator Services.
- (g) Access to Interexchange Service.
- (h) Access to Directory Assistance.
- (i) Toll Limitation Services.

8. Third, Cingular will provide the universal service supported services using its own facilities or a combination of its own facilities and the resale of another carrier's services. Cingular will primarily utilize its own network infrastructure, which includes the same antennae, cell-sites, towers, trunking, mobile switching, and interconnection facilities used to serve its existing customers.

9. Fourth, Cingular will advertise the availability of, and charges for, its universal service qualified offerings. Cingular currently advertises its wireless telecommunication services through several different media channels, including television and radio, newspaper, magazine and other print advertisements, as well as outdoor advertising, direct marketing and the Internet. Cingular will continue to use some combination of these media channels to advertise its universal service qualified offerings throughout its designated ETC service areas. Cingular will comply with all form and content requirements, if any, promulgated by the Commission in the future and required of all designated ETCs.

10. Fifth, Cingular will utilize the high-cost universal service support it receives only

for the provision, maintenance, and upgrading of facilities and services for which the support is intended. As an ETC, Cingular also will offer Lifeline and Link Up discounted telecommunications services to qualified low-income subscribers within its designated ETC service areas.

11. Cingular requests designation as a federal ETC in each of the wire centers and study areas set forth in **Exhibit B** attached to this Amended Petition.

12. Finally, designation of Cingular will serve the public interest by providing consumers with choices and access to competitive, state-of-the-art telecommunications services.

15. ANTI-DRUG ABUSE CERTIFICATION. To the best of my knowledge, no party to the Amended Petition, nor any of their officers, directors, or persons holding 5% or more of the outstanding stock or shares (voting and/or non-voting) as specified in 2002(b) of the Commission's rules, are subject to a denial of federal benefits, including Commission benefits, pursuant to Section 5301 of the Anti-Drug Abuse of 1988, 21 V.S.C. § 862.

I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

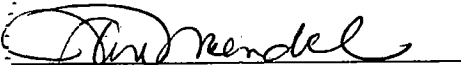
Executed on June 23, 2005.



By: Paul Roth
Title: Executive Vice President –
External Affairs & Public Relations

(Notary Seal)

Subscribed and sworn to before me
This 23rd day of June, 2005.


Notary Public

My Commission Expires
on July 28, 2008

EXHIBIT B

SAC Code	Study Area
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210328 Verizon Florida Inc.

CLLI	Wire Center
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ALFAFLXA	ALAFIA
ALTRFLXA	ALTURAS
ANMRFLXA	ANNA MARIA
ABDLFLXA	AUBURNDALE
BBPKFLXA	BABSON PARK
BARTFLXA	BARTOW
BAYUFLXA	BAYOU
BHPKFLXA	BEACH PARK
BRBAFLXA	BRADENTON BAY
BRTNFLXX	BRADENTON MAIN
BRNDFLXA	BRANDON
CRWDFLXA	CARROLLWOOD
CLWRFLXA	CLEARWATER
CNSDFLXA	COUNTRYSIDE
CYGRFLXA	CYPRESS GARDENS
DUNDFLXA	DUNDEE
DNDNFLXA	DUNEDIN
ENWDFLXA	ENGLEWOOD
FHSDFLXA	FEATHERSOUND
FRSTFLXA	FROSTPROOF
GNDYFLXA	GANDY
HNCYFLXA	HAINES CITY MAIN
HNCYFLXN	HAINES CITY NORTH
HGLDFLXA	HIGHLANDS
HDSNFLXA	HUDSON
HYPKFLXA	HYDE PARK
INRKFLXX	INDIAN ROCKS
KYSTFLXA	KEYSTONE
LKALFLXA	LAKE ALFRED
LKWFLXE	LAKE WALES EAST
LKWFLXA	LAKE WALES MAIN
LKLDFLXE	LAKELAND EAST
LKLDFLXA	LAKELAND MAIN
LKLDFLXN	LAKELAND NORTH
LNLKFLXA	LAND O LAKES
LRGOFLXA	LARGO
LLMNFLXA	LEALMAN
LGBKFLXA	LONGBOAT KEY
LUTZFLXA	LUTZ
MNLKFLXA	MOON LAKE
MLBYFLXA	MULBERRY
MYCYFLXA	MYAKKA
NPRCFLXA	NEW PORT RICHEY
NGBHFLXA	NORTH GULF BEACH

EXHIBIT B

NRPTFLXA	NORTH PORT
OLDSFLXA	OLDSMAR
OSPRFLXA	OSPREY
PLSLFLXA	PALMA SOLA
PLMTFLXA	PALMETTO
PSDNFLXA	PASADENA
PNCRFLXA	PINECREST
PNLSFLXA	PINELLAS
PTCYFLXA	PLANT CITY
POINFLXA	POINCIANA
PKCYFLXA	POLK CITY
RSKNFLXA	RUSKIN
SRSTFLXA	SARASOTA MAIN
NRSDFLXA	SARASOTA NORTHSIDE
SSDSFLXA	SARASOTA SOUTHSIDE
SPRGFLXA	SARASOTA SPRINGS
SMNLFLXA	SEMINOLE
SNSPFLXA	SEVEN SPRINGS
SEKYFLXA	SIESTA KEY
SKWYFLXA	SKYWAY
SGBEFLXA	SOUTH GULF BEACH
SARKFLXA	ST. ARMANDS KEY
STGRFLXA	ST. GEORGE
SPBGFLXA	ST. PETERSBURG MAIN
SPBGFLXS	ST. PETERSBURG SOUTH
SLSPFLXA	SULPHUR SPRINGS
SWTHFLXA	SWEETWATER
TAMPFLXE	TAMPA EAST
TAMPFLXX	TAMPA MAIN
WSSDFLXA	TAMPA WESTSIDE
TRSPFLXA	TARPON SPRINGS
TMTRFLXA	TEMPLE TERRACE
THNTFLXA	THONOTOSASSA
UNVRFLXA	UNIVERSITY
VENCFLXA	VENICE MAIN
VENCFLXS	VENICE SOUTH
WLCRFLXA	WALLCRAFT
WLCHFLXA	WESLEY CHAPEL
WNHNFLXC	WINTER HAVEN
YBCTFLXA	YBOR
ZPHYFLXA	ZEPHYRHILLS
INLKFLXA	INDIAN LAKE
BRJTFLXA	BRADLEY
PRSHFLXA	PARRISH
WIMMFLXA	WIMAUMA

EXHIBIT B

SAC Code	Study Area
215191	Bellsouth - FL

CLLI	Wire Center
ARCHFLMA	ARCHER
BLDWFLMA	BALDWIN
MICCFLLBB	BAREFOOT BAY
BLGLFLMA	BELLE GLADE MAIN
BGPIFLMA	BIG PINE KEY MAIN
BCRTFLBT	BOCA RATON BOCA TEECA
BCRTFLMA	BOCA RATON MAIN
BCRTFLSA	BOCA RATON SANDALFOOT
BYBHFLMA	BOYNTON BEACH MAIN
BRNFLMA	BRONSON
BKVLFLJF	BROOKSVILLE
BNNLFLMA	BUNNELL
CNTMFLLE	CANTONMENT
CDKYFLMA	CEDAR KEYS
CFLDFLMA	CHIEFLAND
CHPLFLJA	CHIPLEY
CCBHFLAF	COBCH CAPE CANAVERAL W. C.
CCBHFLMA	COCOA BEACH
COCOFLMA	COCOA-MAIN
COCOFLME	COCOA-MERRITT ISLAND
DBRYFLDL	DEBARY DELTONA
DBRYFLMA	DEBARY MAIN
DRBHFLMA	DEERFIELD BEACH MAIN
DELDFLMA	DELAND
DLSPFLMA	DELEON SPRINGS
DLBHFLKP	DELRAY BEACH
DLBHFLMA	DELRAY BEACH MAIN
DNLNFLWM	DUNNELLON
DYBHFLFN	DYBH-FENTRESS
DYBHFLMA	DYBH-MAIN
DYBHFLOS	DYBH-OCEAN SHORES
DYBHFLOB	DYBH-ORMOND BEACH
DYBHFLPO	DYBH-PORT ORANGE
EORNFLMA	EAST ORANGE
EGLLFLBG	EGLL-BOWE GARDENS
EGLLFLIH	EGLL-INDIAN HRBR BCH
FRBHFLFP	FERNANDINA BEACH
FLBHFLMA	FLAGLER BEACH
FTPRFLMA	FORT PIERCE MAIN
FTGRFLMA	FT.GEORGE
FTLDFLCR	FTLD CORAL RIDGE
FTLDFLCY	FTLD CYPRESS
FTLDFLJA	FTLD JACARANDA
FTLDFLMR	FTLD MAIN RELIEF
FTLDFLOA	FTLD OAKLAND

EXHIBIT B

FTLDFLPL	FTLD PLANTATION
FTLDFLSG	FTLD SAWGRASS
FTLDFLSU	FTLD SUNRISE
FTLDFLWN	FTLD WESTON
GENVFLMA	GENEVA
GCSPFLCN	GREEN COVE SPRINGS
GSVLFLMA	GSVL-MAIN
GSVLFLNW	GSVL-NORTHWEST
GLBRFLMC	GULF BREEZE
HAVNFLMA	HAVANA
HWTHFLMA	HAWTHORNE
HLWDFLHA	HLWD HALLANDALE
HLWDFLPE	HLWD PEMBROKE PINES
HLWDFLWH	HLWD WEST HOLLYWOOD
HBSDFLMA	HOBE SOUND MAIN
HLNVFLMA	HOLLEY-NAVARRE
HLWDFLMA	HOLLYWOOD MAIN
HMSTFLEA	HOMESTEAD EAST
HMSTFLHM	HOMESTEAD MAIN
HMSTFLNA	HOMESTEAD NARANJA
HTISFLMA	HUTCHINSON IS. MAIN
ISLMFLMA	ISLAMORADA MAIN
JCBHFLAB	JCBH-ATLANTIC
JCBHFLMA	JCBH-MAIN
JCBHFLSP	JCBH-SAN PABLO
JCVLFLAR	JCVL-ARLINGTON
JCVLFLBW	JCVL-BEACHWOOD
JCVLFLCL	JCVL-CLAY STREET MGO
JCVLFLFC	JCVL-FORT CAROLINE
JCVLFLIA	JCVL-INTL AIRPORT
JCVLFLLF	JCVL-LAKE FOREST
JCVLFLNO	JCVL-NORMANDY
JCVLFLOW	JCVL-OCEANWAY
JCVLFLRV	JCVL-RIVERSIDE
JCVLFLSJ	JCVL-SAN JOSE
JCVLFLSM	JCVL-SAN MARCO
JCVLFLJT	JCVL-SOUTHPOINT
JCVLFLWC	JCVL-WESCONNETT
JPTRFLMA	JUPITER MAIN
KYLRFLMA	KEY LARGO MAIN
KYWSFLMA	KEY WEST MAIN
KYHGFLMA	KEYSTONE HEIGHTS
KYLRFLLS	KYLR LARGO SOUND
LKMRFLMA	LAKE MARY
MXVLFLMA	MAXVILLE
MLBRFLMA	MELBOURNE
MIAMFLAP	MIAM AIRPORT
MIAMFLAE	MIAM ALHAMBRA
MIAMFLAL	MIAM ALLAPATTAH
MIAMFLBA	MIAM BAYSHORE
MIAMFLBR	MIAM BEACH
MIAMFLBC	MIAM BISCAYNE

EXHIBIT B

MIAMFLCA	MIAM CANAL
MIAMFLFL	MIAM FLAGLER
MIAMFLGR	MIAM GRANDE
MIAMFLHL	MIAM HIALEAH
MIAMFLIC	MIAM INDIAN CREEK
MIAMFLKE	MIAM KEY BISCAYNE
MIAMFLME	MIAM METRO
MIAMFLSH	MIAM MIAMI SHORES
MIAMFLNM	MIAM NORTH MIAMI
MIAMFLNS	MIAM NORTHSIDE
MIAMFLOL	MIAM OPA LOCKA
MIAMFLPL	MIAM PALMETTO
MIAMFLPB	MIAM POINCIANA
MIAMFLRR	MIAM RED ROAD
MIAMFLSO	MIAM SILVER OAKS
MIAMFLWD	MIAM W. DADE
MIAMFLWM	MIAM W. MIAMI
MCNPFLMA	MICANOPY
MDBGFLPM	MIDDLEBURG
MLTNFLRA	MILTON RAVINE
MNDRFLAV	MNDR-AVENUES
MNDRFLLW	MNDR-LEMONWOOD
MNDRFLLO	MNDR-LORETTO
MRTHFLVE	MRTH VACA KEY
NKLRFLMA	N. KEY LARGO MAIN
NDADFLAC	NDAD ARCH CREEK
NDADFLBR	NDAD BRENTWOOD
NDADFLGG	NDAD GOLDEN GLADES
NDADFLOL	NDAD OLETA
NSBHFLMA	NEW SMYRNA BEACH
NWBYFLMA	NEWBERRY
OKHLFLMA	OAK HILL
OLTWFLLN	OLD TOWN
ORLDFLAP	ORLD-AZALEA PARK
ORLDFLCL	ORLD-COLONIAL
ORLDFLMA	ORLD-MAGNOLIA
ORLDFLPC	ORLD-PINECASTLE
ORLDFLPH	ORLD-PINEHILLS
ORLDFLSA	ORLD-SAND LAKE
ORPKFLMA	ORPK-MAIN
ORPKFLRW	ORPK-RIDGEWOOD
OVIDFLCA	OVIDO
PACEFLPV	PACE PINE VILLA
PAHKFLMA	PAHOKEE MAIN
PLTKFLMA	PALATKA
PLCSFLMA	PALM COAST
PRSNFLFD	PIERSON
PMBHFLCS	PMBH CORAL SPRINGS
PMBHFLFE	PMBH FEDERAL
PMBHFLMA	PMBH MARGATE
PMBHFLTA	PMBH TAMARAC
PNSCFLBL	PNSC-BELMONT

EXHIBIT B

PNSCFLFP	PNSC-FERRY PASS
PNSCFLHC	PNSC-HILLCREST
PNSCFLPB	PNSC-PERDIDO BAY
PNSCFLWA	PNSC-WARRINGTON
PMPKFLMA	POMONA PARK
PMBHFLNP	POMPANO BEACH
PNVDFLMA	PONTE VEDRA BEACH
PTSLFLMA	PORT ST. LUCIE MAIN
PTSLFLSO	PTSL SOUTH PTSL
SNFRFLMA	SANFORD
SBSTFLFE	SBST FELLSMERE
SBSTFLMA	SEBASTIAN MAIN
STAGFLBS	STAG-BEACH SIDE
STAGFLMA	STAG-MAIN
STAGFLSH	STAG-SHORES
STAGFLWG	STAG-WORLDGOLF
STRNFLMA	STUART MAIN
SGKYFLMA	SUGARLOAF KEY MAIN
SYHSFLCC	SUNNY HILLS
TTVLFLMA	TITUSVILLE
TRENFLMA	TRENTON
VERNFLMA	VERNON
VRBHFLMA	VERO BEACH MAIN
VRBHFLBE	VRBH BEACHLAND
WELKFLMA	WELAKA
WPBHFLGR	WPBH GARDENS
WPBHFLGA	WPBH GREENACRES
WPBHFLHH	WPBH HAVERHILL
WPBHFLLE	WPBH LAKE WORTH
WPBHFLAN	WPBH MAIN ANNEX
WPBHFLRB	WPBH RIVIERA BEACH
WPBHFLRP	WPBH ROYAL PALM BCH
WWSPFLHI	WWSP-HIGHLAND
WWSPFLSH	WWSP-SPRING HILL
YNTWFLMA	YANKEETOWN
YULEFLMA	YULEE
LYHNFLOH	LYNNHAVEN
PCBHFLNT	PANAMA CITY BEACH
PNCYFLMA	PANAMA CITY MAIN
YNFNFLMA	YOUNGSTOWN-FOUNTAIN
LKCYFLMA	LAKE CITY
GCVLFLMA	GRACEVILLE
JAY-FLMA	JAY
PRRNFLMA	PERRINE MAIN
MNSNFLMA	MUNSON
CSCYFLBA	CROSS CITY
PNCYFLCA	PANAMA CITY CALLAWAY

EXHIBIT C

HIGH-COST CERTIFICATION

I, Paul Roth, in my capacity as Executive Vice President – External Affairs & Public Relations of Cingular Wireless LLC, and on behalf of its subsidiary licenses New Cingular Wireless PCS LLC, Blue Licenses Holding, LLC, Orange Licenses Holding, LLC, Melbourne Cellular Telephone Company, Ocala Cellular Telephone Company Inc. and Sarasota Cellular Telephone Company (collectively, Cingular), being of lawful age and duly sworn, state, declare and certify under penalty of perjury as follows:

1. Cingular will use the universal service support it receives only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

2. I am authorized by Cingular to make this statement.

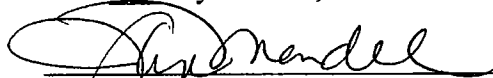
I hereby certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on June 23, 2005.



By: Paul Roth
Title: Executive Vice President –
External Affairs & Public Relations

Subscribed and sworn to before me
This ^{23rd} day of June, 2005.


Notary Public

**My Commission Expires
on July 28, 2008**

(Notary Seal)

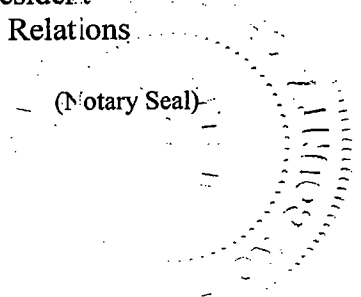


EXHIBIT D

Table 1. Cellular and broadband PCS licenses that were transferred to Cingular Wireless LLC through the AT&T Wireless Services, Inc. acquisition and that cover areas in Florida.

Licensee	Call Sign	Service*	Market.	Block	Market Name
Blue Licenses Holding, LLC	KNKA364	CL	CMA012	A	Miami-Fort Lauderdale-Hollywood, FL
Blue Licenses Holding, LLC	KNKA515	CL	CMA022	A	Tampa-St. Petersburg, FL
Blue Licenses Holding, LLC	KNKA342	CL	CMA051	A	Jacksonville, FL
Blue Licenses Holding, LLC	KNKA347	CL	CMA060	A	Orlando, FL
Blue Licenses Holding, LLC	KNKA355	CL	CMA072	A	West Palm Beach-Boca Raton, FL
Blue Licenses Holding, LLC	KNKA457	CL	CMA114	A	Lakeland-Winter Haven, FL
Blue Licenses Holding, LLC	KNKA696	CL	CMA127	A	Pensacola, FL
Blue Licenses Holding, LLC	KNKA528	CL	CMA146	A	Daytona Beach, FL
Blue Licenses Holding, LLC	KNKA598	CL	CMA164	A	Fort Myers, FL Counties - Lee
Blue Licenses Holding, LLC	KNKA749	CL	CMA208	A	Fort Pierce, FL
Blue Licenses Holding, LLC	KNKA739	CL	CMA265	A	Fort Walton Beach, FL
Blue Licenses Holding, LLC	KNKN555	CL	CMA360	A	Florida 1 - Collier
Blue Licenses Holding, LLC	KNKQ386	CL	CMA361	A	Florida 2 - Glades
Blue Licenses Holding, LLC	KNKQ421	CL	CMA361	A	Florida 2 - Glades
Blue Licenses Holding, LLC	KNKN678	CL	CMA362	A	Florida 3 - Hardee
Blue Licenses Holding, LLC	KNKN738	CL	CMA363	A	Florida 4 - Citrus
Blue Licenses Holding, LLC	KNKQ422	CL	CMA364	A	Florida 5 - Putnam
Bradenton Cellular Partnership	KNKA647	CL	CMA211	A	Bradenton, FL
Melbourne Cellular Tel. Co.	KNKA617	CL	CMA137	A	Melbourne-Titusville-Palm Bay, FL
New Cingular Wireless PCS, LLC	KNLG409	CW	BTA107	E	Daytona Beach, FL
New Cingular Wireless PCS, LLC	KNLG433	CW	BTA152	E	Fort Pierce-Vero Beach-Stuart, FL
New Cingular Wireless PCS, LLC	KNLG482	CW	BTA289	E	Melbourne-Titusville, FL
New Cingular Wireless PCS, LLC	KNLG485	CW	BTA293	D	Miami-Fort Lauderdale, FL
New Cingular Wireless PCS, LLC	KNLG509	CW	BTA336	E	Orlando, FL
New Cingular Wireless PCS, LLC	KNLG580	CW	BTA469	D	West Palm Beach-Boca Raton, FL
New Cingular Wireless PCS, LLC	KNKA481	CL	CMA168	A	Tallahassee, FL
New Cingular Wireless PCS, LLC	KNKA583	CL	CMA192	A	Gainesville, FL
New Cingular Wireless PCS, LLC	KNKN550	CL	CMA364	A	Florida 5 - Putnam
New Cingular Wireless PCS, LLC	KNKN773	CL	CMA365	A	Florida 6 - Dixie
New Cingular Wireless PCS, LLC	KNKQ382	CL	CMA366	A	Florida 7 - Hamilton
New Cingular Wireless PCS, LLC	KNKN628	CL	CMA367	A	Florida 8 - Jefferson
New Cingular Wireless PCS, LLC	KNKQ290	CL	CMA368	A	Florida 9 - Calhoun
New Cingular Wireless PCS, LLC	KNKN669	CL	CMA369	A	Florida 10 - Walton
New Cingular Wireless PCS, LLC	WPWB958	CW	MTA013	A	Tampa-St. Petersburg-Orlando
New Cingular Wireless PCS, LLC	WPVC979	CW	MTA015	A	Miami-Fort Lauderdale
Ocala Cellular Tel. Co., Inc.	KNKA753	CL	CMA245	A	Ocala, FL
Sarasota Cellular Tel. Co.	KNKA494	CL	CMA167	A	Sarasota, FL

*CL = Cellular

CW = Broadband PCS

EXHIBIT D

Table 2. Cellular and broadband PCS licenses held by Cingular Wireless LLC both before and after the AT&T Wireless Services, Inc. acquisition that cover areas in Florida.

Licensee	Call Sign	Service*	Market.	Block	Market Name
Florida RSA No. 2B (Indian River) Limited Partners	KNKN990	CL	CMA361	B	Florida 2 - Glades
Jacksonville MSA Limited Partnership	KNKA287	CL	CMA051	B	Jacksonville, FL
Jacksonville MSA Limited Partnership	KNKQ335	CL	CMA364	B	Florida 5 - Putnam
Orange Licenses Holding, LLC	KNLG616	CW	BTA151	D	Fort Myers, FL
Orange Licenses Holding, LLC	KNLG617	CW	BTA151	E	Fort Myers, FL
Orange Licenses Holding, LLC	KNLG618	CW	BTA152	D	Fort Pierce-Vero Beach-Stuart, FL
Orange Licenses Holding, LLC	KNLG619	CW	BTA154	E	Fort Walton Beach, FL
Orange Licenses Holding, LLC	KNLG621	CW	BTA159	E	Gainesville, FL
Orange Licenses Holding, LLC	WPZY674	CW	BTA159	C	Gainesville, FL
Orange Licenses Holding, LLC	KNLG627	CW	BTA239	E	Lakeland-Winter Haven, FL
Orange Licenses Holding, LLC	WPZY678	CW	BTA239	C	Lakeland-Winter Haven, FL
Orange Licenses Holding, LLC	KNLG632	CW	BTA313	E	Naples, FL
Orange Licenses Holding, LLC	KNLF325	CW	BTA326	C	Ocala, FL
Orange Licenses Holding, LLC	KNLG634	CW	BTA326	E	Ocala, FL
Orange Licenses Holding, LLC	KNLF362	CW	BTA340	C	Panama City, FL
Orange Licenses Holding, LLC	KNLH584	CW	BTA340	E	Panama City, FL
Orange Licenses Holding, LLC	KNLG637	CW	BTA343	E	Pensacola, FL
Orange Licenses Holding, LLC	KNLG638	CW	BTA408	E	Sarasota-Bradenton, FL
Orange Licenses Holding, LLC	WPZY676	CW	BTA408	C	Sarasota-Bradenton, FL
Orange Licenses Holding, LLC	KNLF361	CW	BTA439	C	Tallahassee, FL
Orange Licenses Holding, LLC	KNLG642	CW	BTA439	E	Tallahassee, FL
Orange Licenses Holding, LLC	KNLG643	CW	BTA440	E	Tampa-St. Petersburg-Clearwater, FL
Orange Licenses Holding, LLC	WPZY677	CW	BTA440	C	Tampa-St. Petersburg-Clearwater, FL
Orange Licenses Holding, LLC	KNKA225	CL	CMA012	B	Miami-Fort Lauderdale-Hollywood, FL
Orange Licenses Holding, LLC	KNKA264	CL	CMA072	B	West Palm Beach-Boca Raton, FL
Orange Licenses Holding, LLC	KNKQ360	CL	CMA360	B	Florida 1 - Collier
Orange Licenses Holding, LLC	KNKQ361	CL	CMA361	B	Florida 2 - Glades
Orange Licenses Holding, LLC	KNKN793	CL	CMA370	B	Florida 11 - Monroe
Orlando SMSA Limited Partnership	KNKA253	CL	CMA060	B	Orlando, FL
Orlando SMSA Limited Partnership	KNKA406	CL	CMA137	B	Melbourne-Titusville-Palm Bay, FL
Orlando SMSA Limited Partnership	KNKA703	CL	CMA146	B	Daytona Beach, FL
Orlando SMSA Limited Partnership	KNKN994	CL	CMA363	B	Florida 4 - Citrus
Orlando SMSA Limited Partnership	KNKQ274	CL	CMA364	B	Florida 5 - Putnam

*CL = Cellular

CW = Broadband PCS